

# **EXHIBIT 15**



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1 MR. ROBERTSON: I'll withdraw the objection to that,  
2 Your Honor.

3 THE COURT: Next one, 123:8 through 124:25.

4 MR. ROBERTSON: This has to do with the data  
5 interface utility, and my notes reflect that Dr. Shamos doesn't  
6 rely on it. Whether the underlying document wasn't objected  
7 to, the fact is, it doesn't have any tendency to prove a fact  
8 that is in dispute, makes it not relevant for purposes of any  
9 invalidity analysis that Dr. Shamos might be offering. I  
10 understand he cited it, but -- it was considered, but he has no  
11 opinions with regard to it.

12 THE COURT: If he has no opinions with respect to it,  
13 then I don't see how it's relevant.

14 MS. STOLL-DeBELL: Your Honor, I think it's rebuttal  
15 testimony because this database data interface utility is a  
16 mechanism to automatically load catalog data into PO Writer,  
17 very similar to Lawson's PO-536 that ePlus is relying on to say  
18 Lawson's system has catalogs and Lawson infringes. And so this  
19 testimony and that document are rebuttal evidence.

20 It was cited in our second supplemental invalidity  
21 contentions and was listed in Dr. Shamos's report. Albeit he  
22 didn't put a cite to that specific document in his claim chart,  
23 I do think it's rebuttal testimony to their infringement  
24 position.

25 THE COURT: How does it come in if he didn't testify

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3 I certify that the foregoing is a correct transcript  
4 from the record of proceedings in the above-entitled matter.

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P. E. Peterson, RPR

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